IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:) BK. NO. 24-40384
WILLIE LANE SHANNON	l, JR.) CHAPTER 13
	SSN: ###-##-9262)
LAURA M. SHANNON)
	SSN: ###-##-9249)
)

Debtors.

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW, ERIN M. MCCARTNEY, Chapter 13 Trustee, and objects to confirmation of the plan pursuant to 11 U.S.C. § 1324 and Neb. R. Bankr. P. 3015-3(B) for the following reason(s):

- 1. The priority claim filed by the Internal Revenue Service suggests the Debtors have not filed all required returns for 2021.
- 2. It appears the Debtor's income on Schedule I is understated based on additional awards/bonuses received by the Debtor.
- 3. Based on claims filed, the plan is underfunded.
- 4. It appears the plan may not satisfy the best interest of the creditors' test.
- 5. The plan proposes to pay over \$20,000 for the retention of a 2022 Indian Challenger. It appears this vehicle may not be usable during all months of the year as a mode of transportation and the Debtors own a 2012 GMC Terrain that appears available for use. Since the plan is not sufficiently funded, it appears this recreational vehicle is causing the plan to not be feasible.

WHEREFORE, Trustee prays that the Trustee's Objection to Confirmation be sustained.

DATED: May 24, 2024

s/ Erin M. McCartney Erin M. McCartney #23663 Chapter 13 Trustee 13930 Gold Circle, Suite #201 Omaha, NE 68144 (402) 697-0437 1-800-884-0437

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Trustee's Objection was served on CHRISTOPHER J GAMM, debtors attorney, via the CM/ECF system of the United States Bankruptcy Court and a copy was mailed on May 24, 2024, by first-class, U.S. mail, postage prepaid to the Debtors at the addresses listed below:

WILLIE LANE SHANNON, JR. 7548 WHITLOCK PLACE LINCOLN, NE 68516-5786 LAURA M. SHANNON 7548 WHITLOCK PLACE LINCOLN, NE 68516-5786

> s/ Erin M. McCartney Erin M. McCartney